

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. #04-10550-WGY

FILED
2004 JUN 30
U.S. DISTRICT COURT
DISTRICT OF MASS
A b: 35

JACQUELINE LASSITER

v.

KIMBER ANDERSON ET AL.

MOTION TO STRIKE AND FOR
FOR FURTHER ANSWERS TO
INTERROGATORIES AND TO
REQUEST FOR PRODUCTION
PROPOUNDED BY PLAINTIFF
TO DEFENDANT FLEET BANK

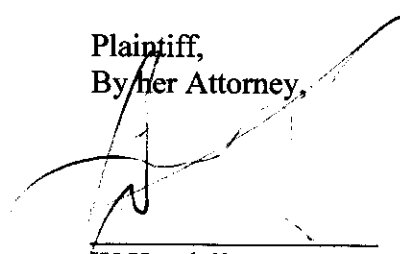
The plaintiff hereby moves that this Court strike the responses served by defendant Fleet Bank to interrogatories numbered 4, 8-10, 12-14 and to Requests for Production, numbered 8-10, 11, 15, 17-19, 22, 26-31 and order that the defendant serve further answers to same.

The answers in question are "non-responsive" and the Objections are not well founded.

The information sought by way of the discovery requests is relevant to the material issues and is reasonably likely to lead to the discovery of admissible information.

Plaintiff relies on the Affidavit In Support of Motion To Strike, hereto annexed, the Exhibits and the Complaint, federal regulations cited in the Affidavit (of counsel), Defendants' Answers and Affirmative Defenses, on file in this action.

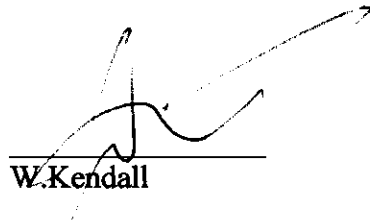
Plaintiff,
By her Attorney,



W. Kendall
136 Warren Street
Roxbury, Ma.02119
(617) 442-6130

LOCAL RULE 7.1(A)(2) CERTIFICATE

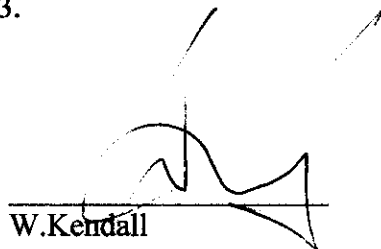
I, W.Kendall, counsel for plaintiff, hereby certify that in advance of the filing of the Plaintiff's Motion To Strike and For Further Answers, I did seek to confer with Melanie Glickson, esq., counsel for the defendant, to obtain a supplementation of the Answers to Discovery, which Plaintiff had identified in a writing to defense counsel, and that such efforts did not result in the narrowing or resolution of the parties' discovery dispute.



W.Kendall

CERTIFICATE OF SERVICE

I, W.Kendall, counsel for plaintiff, hereby certify that on 29th.August, '04, I made service of the foregoing Motion To Strike And For Further Answers, Affidavit, Exhibits and L.R.7.1(A) Certificate, first class mail, postage pre-paid on Melanie Glickson, esq., Edwards, Angell, 2800 Financial Plaza, Providence, R.I. 02903.



W.Kendall